

## **8. FIELD DOCUMENTATION**

The primary objective of this section is to describe how field activities will be documented. Accurate and consistent documentation of field activities is essential to the success of the project. Documentation will be maintained in accordance with applicable management control procedures (MCPs) and other contractor documents. The FTL will be responsible for controlling and maintaining all field documents and records. In addition, a RA report is required to document the field activities. The RA report will be submitted 60 days after the final inspection by the Agencies as defined in the FFA/CO (DOE-ID 1991).

### **8.1 Audits**

Audits of various field documents may be performed throughout the duration of the project. This will ensure documentation is sufficient and meets the requirements established in MCPs, and other applicable programs, procedures, and policies.

### **8.2 Logbooks**

Field logbooks contain records of all activities related to onsite actions. Data recorded in logbooks include information on excavation activities, sampling, measurements taken, soil descriptions, cylinder locations, and observations or conditions that could affect the quality of data. Using logbook data, personnel should be able to reconstruct events that occurred during field activities. At a minimum, a field logbook should contain the following information:

- Modifications to activities or procedures described in planning documents
- Justifications for such modifications
- Unusual occurrences or circumstances
- Any audit findings and corrective actions implemented as a result of such findings.

All entries shall use nonsmearable, waterproof permanent ink (preferably black), they must be signed and dated, and all changes must be legible. Drawing a single line through the incorrect information and signing and dating the change make changes. Logbook control and use shall be in accordance with INEEL procedures.

Logbooks are issued to specified personnel who are then responsible for security and return of logbooks at the conclusion of the project. Original logbooks will become part of the project records and will be maintained by Administrative Records and Document Control (ARDC).

#### **8.2.1 Field Team Leader's Daily Logbook**

In addition to the elements listed above, the FTL logbook should contain the following:

- Description of field activities
- Excavation inspections
- Visitor log

- List of site contacts
- Problems encountered.

This logbook will be signed and dated at the end of each day's sampling activities.

### **8.2.2 Sample Logbooks**

Sample logbooks will be used by the sample team(s). Each sample logbook will contain information such as the following:

- Physical measurements
- All QC samples
- Sample information (sample IDs, sample location, sample collection information, analyses requested for each sample, and sample matrix)
- Shipping information (collection dates, shipping dates, cooler identification number, destination, CoC number, and name of shipper).

### **8.2.3 Field Instrument Calibration/Standardization Logbook**

A logbook containing records of calibration data will be maintained for each piece of equipment requiring periodic calibration or standardization. Equipment requiring calibration includes, but is not limited to, PID, explosivometers, magnetometers, radiological monitoring equipment, the FTIR, and MS. This logbook will contain log sheets to record the date, time, method of calibration, name of the calibrating individual, and instrument identification number.

## **8.3 Data Management and Inventory Control**

Data management and inventory is an important aspect of field documentation. The *Data Management Plan*, provides additional detail about the management of analytical data.

### **8.3.1 Data Management**

All original data collected in the field will be retained in accordance with Section 20.2 of the INEEL FFA/CO, DOE Order 200.1, and any other contractor document requirements. All data will be forwarded to ARDC as part of the project file or uploaded into the ERIS database, as required.

Electronic data will be managed in accordance with DOE Order 200.1 in specially designed Microsoft Excel files; these files will be compatible with site databases. An example spreadsheet that captures all information for each cylinder is shown as Figure 8-1.

### **8.3.2 Inventory Control**

Upon excavation, each cylinder will be marked with a unique identifier that can be traced back to the location where the cylinder was unearthed. A label, tag, or other means that results in legible and long lasting marking will be used. This cylinder identification number will be used to track cylinders throughout the project.

INFEEL									
Cylinder ID	Suspected Contents	Rack Location	Date Excavated	Time Excavated	Excavation Location	Valve Configuration	Analytical Results	Sample Method	Comments
CPP-84-0001	Oxygen		5/01/00	1000	C1				
CPP-84-0002	Oxygen		5/01/00	1000	C1				
CPP-84-0003	Acetylene		5/01/00	1000	C1				
CPP-84-0001	Argon		5/01/00	1000	C1				
CPP-84-0001	Argon		5/01/00	1000	C1				
CPP-84-0001	Argon		5/01/00	1000	C1				

**Figure 8-1.** Example data sheet.

The movement of materials and equipment necessary to complete the project will also be tracked. Dates and times that major pieces of equipment (i.e., track hoe, laboratory instrumentation, etc.) come into service and leave the site will be tracked.

## 8.4 Reports

Several reports will be generated during the performance of this project including daily, weekly, and a final report. Daily reports will serve to communicate daily status. Weekly reports will be generated providing percent complete, specific accomplishments, problems encountered, and other relevant information. A RA report including results and conclusions will be generated at the end of the project.

### 8.4.1 Daily Reports

Status of project activities will be communicated to project management on a daily basis. The purpose of this is to keep project management apprised of progress, issues, and to coordinate resources as needed. Reporting will typically be informal and may be performed over the telephone, in person, email, or by other means.

### 8.4.2 Weekly Reports

Weekly status reports will be generated as required. These reports will summarize project status, accomplishments, problems encountered, and recommended actions. The percent of project completion to date will be provided also.

### 8.4.3 Remedial Action (RA) Report

The remedial action process includes the preparation of at least on primary and one secondary document. The prefinal inspection report will be a secondary document that will include the following:

- Outstanding construction requirements
- Actions required to resolve items
- Completion date
- Date of final inspection (NOTE: If a final inspection is deemed to not be necessary, the prefinal inspection will be used as the final inspection.).

The prefinal inspection will be conducted by the PM, at a minimum, and possibly by an independent fourth party. All comments will be finalized in the primary RA report. To the extent possible, RA reports for individual work elements will be consolidated into a single RA report. The RA report will be prepared at the completion of remedial action and will include the following:

- A brief description of outstanding items from the prefinal inspection report
- Synopsis of work defined in the *RA Work Plan* and certification that this work was performed
- Explanation of any modifications to the *RA Work Plan*
- Certification that the remedy is operational and functional.

Documentation necessary to support a notice of completion as discussed in Part XXV of the FFA/CO (DOE-ID 1991). The documentation will be sufficient to support that no further remedial action, including institutional controls, is required.

## **8.5 Records and Reference Documents**

The FTL will be responsible for controlling and maintaining all field documents and records and for verifying that all required documents to be submitted to the contractor ER ARDC are maintained in good condition. All entries will be made in indelible black ink. Entry errors will be corrected by drawing a single line through the error and entering the correct information. All corrections will be initialed and dated.

## **8.6 Training Records/Documentation**

Proof that all required training courses have been completed (including applicable refresher training) must be maintained on the project at all times. Examples of acceptable written training documents include "40 Hour OSHA HAZWOPER Card," "Respirator Authorization Card," "Radiological Worker II Card," "Medic/First Aid Training Card," and/or a copy of an individual's or department's TRAIN System printout demonstrating completion of training. A copy of the certificate issued by the institution where the training was received is also acceptable proof of training. The radiological worker training must be documented on an official authorized card and have the designated INEEL site-specific training stamped or written on the card (unless issued prior to March 1997).

Before beginning work at the project, project-specific training will be conducted by the field CC, FTL, and/or HSO. This training will consist of a complete review of this HASP and attachments, with time for discussion and questions. Upon completing project-specific training, personnel will sign a training acknowledgement roster (Form 361.02) indicating that they have received this training, understand the tasks and associated hazards that will be conducted, and agree to follow all HASP and other safety requirements. Completed Form(s) 361.02 will be copied and maintained at the project, and the original will be sent to the ER Training Coordinator (MS 3902) within 5 working days.

If not previously completed, each 40-hour trained Hazardous Waste Operations and Emergency Response (HAZWOPER) worker must complete the HAZWOPER initial 24-hr supervised field experience training. Performance will be monitored by the FTL and/or HSO for three days of site activities for satisfactory work performance. For 24-hr trained HAZWOPER workers, the same procedure will be followed, except the supervised field experience will only last one day. Upon

completion, the Field Experience Observation Checklist and Form 361.47 will be forwarded to the ER Training Coordinator (MS 3902) within 5 working days.

The FTL, HSO, and RCT, as applicable, will conduct a daily pre-job safety briefing of the task(s) to be performed that day. Pre-job briefings must be documented on Form 434.15, "Pre-Job Briefing Attendance Record" and perform requirements of Form 434.14 ("Pre-Job Briefing Checklist"). During this briefing, tasks are to be outlined, hazards identified, hazard controls and work zones established, PPE requirements discussed, and employees' questions answered. At the completion of this briefing, work control documents will be read and signed. Particular emphasis will be placed on lessons learned from the previous day's activities and how tasks can be completed in the safest, most efficient manner. All personnel will be asked to contribute ideas to enhance worker safety and mitigate potential exposures at the project.

## 9. REFERENCES

- 29 CFR 1910, July 2000, "Occupational Safety and Health Standards," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1910.120, July 2000, "OSHA hazardous waste operations and emergency response," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926, July 2000, "Safety and Health Requirements for Construction," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.150, July 2000, "Fire protection," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.300, July 2000, "General requirements," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.400, July 2000, "Introduction," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.50, July 2000, "Medical services and first aid," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.550, July 2000, "Cranes and derricks," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.600, July 2000, "Equipment," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.65, July 2000, "Hazardous waste operations and emergency response," *Code of Federal Regulations*, Office of the Federal Register.
- 29 CFR 1926.651, July 2000, "Specific excavation requirements," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 122.26, July 2000, "Storm water discharges during construction," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 261, July 2000, "Identification of Hazardous Waste," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 261.20 through 24, July 2000, "Hazardous waste characteristics identification," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 261.7, July 2000, "Identification and listing of hazardous waste, residues of hazardous waste in containers," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264 Subpart J, July 2000, "Tank Systems," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264 Subpart X, July 2000, "Miscellaneous Units," *Code of Federal Regulations*, Office of the Federal Register.

- 40 CFR 264 Subpart BB, July 2000, "Air Emission Standards for Equipment Leaks," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264 Subpart CC, July 2000, "Air Emission Standards for Tanks, Surface Impoundments, and Containers," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264.114, July 2000, "Disposal or decontamination of equipment, structures, and soils," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264.170 through 179, July 2000, "Use and management of containers," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264.310, July 2000, "TSD facility standards, closure and post closure care," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264.553, July 2000, "Temporary units," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 264.554, July 2000, "Remediation waste staging piles," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 268, July 2000, "Land Disposal Restrictions," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 268.49, July 2000, "Alternative LDR treatment standards for contaminated soil," *Code of Federal Regulations*, Office of the Federal Register.
- 40 CFR 300.440, July 2000, "Procedures for planning and implementing offsite response actions," *Code of Federal Regulations*, Office of the Federal Register.
- ANSI/CGA, 1991, Standard V-9, Standards for Compressed Gas Cylinder Valves.
- Compressed Gas Association, 1993, Pamphlet C-6, Standards for Visual Inspection of Steel Compressed Gas Cylinders.
- Compressed Gas Association, 1995, Pamphlet P-22, The Responsible Management and Disposition of Compressed Gases and their Containers.
- Compressed Gas Association, 1995, Pamphlet C-6.1, Standards for Visual Inspection of High Pressure Aluminum Compressed Gas Cylinders.
- Compressed Gas Association, 1996, Guideline 6.2, Guidelines for Visual Inspection and Requalification of Fiber Reinforced High Pressure Cylinders.
- Compressed Gas Association, 1999, Pamphlet C-6.3, Guidelines for Visual Inspection and Requalification of Low Pressure Aluminum Compressed Gas Cylinders.
- Compressed Gas Association, 2000, Pamphlet P-1, Safe Handling of compressed Gases in Containers.
- Compressed Gas Association, 2000, Guidelines for Periodic Visual Inspection and Requalification of Acetylene Cylinders.

Defense Logistics Agency, *Storage and Handling of Compressed Gases and Liquids in Cylinders, and of Cylinders*, DLAR 4145.25, January 1990.

Anderson, Jay E. and Mark L. Shumar, June 1989, *Guidelines for Revegetation of Disturbed Sites at the Idaho National Engineering Laboratory*, DOE/ID-12114, Idaho National Engineering and Environmental Laboratory, EG&G Idaho, Idaho Falls, Idaho.

DOE-ID, December 4, 1991, *Federal Facility Agreement and Consent Order and Action Plan*, 1088-06-29-120, U.S. Department of Energy Idaho Field Office, Environmental Protection Agency Region 10, State of Idaho Division of Environmental Quality.

DOE-ID, 1995, *The Data Management Plan for the Idaho National Engineering Laboratory Environmental Restoration Program*, ER-DMP; INEL-95/0257, Rev. 1, Idaho National Engineering and Environmental Laboratory, Lockheed Martin Idaho Technologies, Idaho Falls, Idaho.

DOE-ID, 1997, *Implementing Project Management Plan for the Idaho National Engineering and Environmental Laboratory Remediation Program (IPMP)*, INEEL/EXT-97-00032, Section 13, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID 1999a, *Final Record of Decision (ROD) Idaho Nuclear Technology and Engineering Center (INTEC) Operable Unit (OU) 3-13*, DOE/ID-10660, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, November 1999b, *Idaho National Engineering Laboratory Reusable Property, Recyclable Materials, and Waste Acceptance Criteria*, DOE/ID-10381, Rev. 10, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, July 2000a, *Preliminary Characterization Plan for OU 3-13, Group 6, RD/RA Buried Gas Cylinder Sites: CPP-84 and CPP-94*, INEEL/EXT-2000-00398, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, February 2000b, *Remedial Design/Remedial Action Scope of Work for Waste Area Group 3, Operable Unit 3-13*, DOE/ID-10721, Rev. I, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, November 2000c, *Summary of FY-2000 Characterization Activities at OU 3-13 CPP-84 and CPP-94 (Buried Gas Cylinders)*, INEEL/EXT-2000-01113, Engineering Design File ER-EDF-223, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, May 2000d, *Hazard Classification for Remediation of OU 3-13 Group 6 RD/RA Buried Gas Cylinder Sites: CPP-84 and CPP-94*, INEEL/EXT-2000-000254, Rev. 1, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, 2000e, *Quality Assurance Project Plan for Waste Area Groups 1, 2, 3, 4, 6, 7, and 10 and Inactive Sites*, DOE/ID-10587, Revision 6, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.

DOE-ID, May 2001, *Data Management Plan for Field and Nonchemical Data from Operable Unit 3-13, Group 6 Buried Gas Cylinders*, DOE/ID-10836, U.S. Department of Energy, Idaho Operations Office, Idaho Falls, Idaho.



DOE Order O 200.1, "Information Management Program," U.S. Department of Energy, September 30, 1996.

DOE Order O 435.1, "Radioactive Waste Management," U.S. Department of Energy, July 9, 1997.

DOE Order SO 151, "Introduction to Emergency Management Guide," U.S. Department of Energy, August 21, 1997.

DOE Order SO 151.1, "Introduction to Emergency Management Guide," U.S. Department of Energy, August 21, 1997.

EPA, 1994, *Guidance for the Data Quality Objectives Process*, EPA QA/G-4, EPA/600/R-96/055, September.

EPA, 1997, *Index to EPA Test Methods*, EPA/600/8-89/046, October.

IDAPA 16.01.01.585, June 30, 1995, "Toxic Air Pollutants for Non-Carcinogenic Increments," *Idaho Administrative Code*, Office of Administrative Rules.

IDAPA 16.01.01.586, June 30, 1995, "Toxic Air Pollutants for Carcinogenic Increments," *Idaho Administrative Code*, Office of Administrative Rules.

IDAPA 16.01.01.650, May 1, 1994, "Rules for Control of Fugitive Dust," *Idaho Administrative Code*, Office of Administrative Rules.

IDAPA 16.01.01.651, May 1, 1994, "General Rules," *Idaho Administrative Code*, Office of Administrative Rules.

IDAPA 16.01.05.005, April 5, 2000, "Identification and Listing of Hazardous Waste," *Idaho Administrative Code*, Office of Administrative Rules.

IDAPA 16.01.05.008, April 5, 2000, "Standards for Owners and Operators of Hazardous Waste," *Idaho Administrative Code*, Office of Administrative Rules.

IDAPA 16.01.05.011, April 5, 2000, "Land Disposal Restrictions," *Idaho Administrative Code*, Office of Administrative Rules.

INEEL, July 6, 2000, *Radiation Protection - INEEL Radiological Control Manual*, Company Manual 15A, Idaho National Engineering and Environmental Laboratory, Bechtel BWXT Idaho, LLC, Idaho Falls, Idaho.

INEEL, January 17, 2001, *Radiation Protection Procedures*, Company Manual 15B, Idaho National Engineering and Environmental Laboratory, Bechtel BWXT Idaho, LLC, Idaho Falls, Idaho.

INTEC NEPA Evaluation, Number INTEC-00-021

Rodriguez, R. R., A. L. Schafer, J. McCarthy, P. Martian, D. E. Burns, D. E. Raunig, N. A. Burch, and R. L. VanHorn, November 1997, *Comprehensive RI/FS for the Idaho Chemical Processing Plant OU 3-13 at the INEEL—Part A. RI/BRA Report (Final)*, DOE/ID-10534, U.S. Department of Energy, Idaho Operations Office.